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December 31, 2014

Hon. Michael A. Hammer
United States Magistrate Judge
United States Court House
50 Walnut Street
Newark, New Jersey 07101

Re: United States v. Keila Ravelo
Magistrate No. 14-6800 (JAD)

Dear Judge Hammer:

On December 22, 2014, this Court issued an Order (#8) Setting Conditions of Release for Ms. Ravelo. Among those conditions were a \$500,000 bond secured by an apartment in Florida, a retirement account in an amount up to \$200,000 and a painting. Thus far two of these conditions have been met: the painting is in my firm's possession (with the consent of the Government and Clerk's Office pending professional crating) and a lien has been filed on the Florida property in favor of the government. We are now attempting to comply with the third condition regarding the retirement account. After discussions with the Government, it appears that an order in the form enclosed will be sufficient to perfect the bond. If this proposed order meets with the Court's approval, we ask that the Court sign it and return it to us so that we may serve it on Citibank. It is my further understanding that upon proof of service of this order that Ms. Ravelo may be released from location monitoring. We will provide proof of the Florida lien to the Pretrial Services Agency and the Government.

Thank you for your courtesies in this matter.

Respectfully submitted,



AIDAN P. O'CONNOR

cc. Andrew Kogan, AUSA (via email)
Patrick Joyce, Esq. (via email)
Elizabeth Auson, Pretrial Services Officer (via email)

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

KEILA RAVELO

Hon. Michael A. Hammer

Magistrate No. 14-6080 (JAD)

ORDER

This matter having come before the Court upon the joint application of the defendant KEILA RAVELO, by her attorney Aidan P. O'Connor, Esq., and the United States of America, by Paul J. Fishman, United States Attorney for the District of New Jersey, (Andrew Kogan, Assistant U.S. Attorney, appearing) for an order to restrain certain assets pending further order of this court; and for good and sufficient cause shown;

WHEREFORE, it is on this ____ day of December, 2014, ORDERED that:

Citibank shall:

- a. take reasonable and effective steps to prohibit Defendant Keila Ravelo (SSN: [REDACTED]) from withdrawing, removing, assigning, transferring, pledging, encumbering, disbursing, dissipating, converting, selling or otherwise disposing of any asset from her account number [REDACTED] such that it would cause the balance to go below \$200,000 (hereinafter, the Citibank IRA Account") except as directed by further order of the Court; and
- b. notify promptly Pretrial Services Officer Barbara Hutchinson of the United States Pretrial Services Agency for the District of New Jersey (973-645-

2230), Assistant United States Attorney Andrew Kogan, of the United States Attorney's Office for the District of New Jersey (973-645-2700), and Aidan P. O'Connor of Pashman Stein, P.C. (201-270-4940) if any person attempts to withdraw, remove, assign, transfer, pledge, encumber, disburse, dissipate, convert, sell, or otherwise dispose of any asset from the Citibank IRA Account which would cause the balance to fall below \$200,000.

IT IS FURTHER ORDERED that defendant Keila Ravelo shall not, directly or through intermediaries, withdraw, remove, assign, transfer, pledge, encumber, disburse, dissipate, convert, sell, or otherwise dispose of any asset from the Citibank IRA Account specified in this order which would cause the balance to go below \$200,000 without written approval from the Pretrial Services Agency or order of this Court.

IT IS FURTHER ORDERED that, after the return of the within Order from the Court, counsel for the defendant shall serve a copy of this order upon all interested parties and provide proof of service to the Pretrial Services Agency and the United States Attorney's Office.

HON. MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE